

**2014 CONFLICT OF INTEREST CODE
BIENNIAL REVIEW REPLY FORM**

2014 AUG 4 AM 9 12

Contact Person: Millie BusseTelephone Number: (619) 455-6896CLERK OF THE BOARD
OF SUPERVISORSName of Agency: San Diego County Employees Retirement AssociationMailing Address: 2275 Rio Bonito Way, Suite 200, San Diego, CA 92108

This agency has reviewed its conflict of interest code and has determined that:

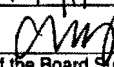
☒ **Amendments are necessary:** (Attach Amended Code)
(Check all that applies)

- ☐ Include new positions (including consultants) which must be designated
- ☒ Revise the titles of existing positions
- ☒ Delete titles of positions that have been abolished
- ☐ Delete positions that manage public investments
- ☐ Revise disclosure categories
- ☐ Other _____

☐ **No amendments are necessary.** Our agency's code accurately designates all positions which make or participate in the making of governmental decisions; the disclosure assigned to those positions accurately requires the disclosure of all investments, business positions, interests in real property and sources of income which may foresee-ably be affected materially by the decision made by those designated positions; and the code includes all other provisions required by Government Code Section 87302.


Signature of Chief Executive Officer: Date: 7/28/14You must complete this report regardless of how recently your code was approved or amended. **Please return this report no later than October 1, 2014 to:**

**Clerk of the Board of Supervisors
(Conflict of Interest Code)
1600 Pacific Highway, Room 402
San Diego, CA 92101**

Approved and/or authorized by the Board of Supervisors of the County of San Diego	
Meeting Date: <u>12/2/14</u>	Minute Order No. <u>23</u>
By: <u></u>	Date: <u>12/12/14</u>
Deputy Clerk of the Board Supervisors	



Strength. Service. Commitment.

Date: July 29, 2014
To: Teresa Zurita
From: Millie Busse 
Re: Changes to SDCERA Conflict of Interest Code

Dear Teresa,

We have a few changes to our COI for this year. There are three title changes and we have removed one position, Retirement Chief Investment Officer, from the reporting list as we no longer staff this position.

Attached please find the Biennial Review Reply Form, along with a revised copy of Appendix A (red-line and final versions). I can also provide you with electronic copies should you need them.

If you need anything else at all, please let me know. I can be reached at 515-6896 or mbusse@sdcera.org.

Thanks very much.

APPENDIX A

San Diego County Employees Retirement Association Designated Positions and Disclosure Categories

It has been determined that the positions listed below will file a statement of economic interest pursuant to Government Code Section 81000 et seq.:

<u>Designated Positions</u>	<u>Disclosure Category</u>
Retirement Assistant Administrator, Director Member Services	1,2,3
Retirement Assistant Administrator, Chief Operating Officer	1,2,3
General Counsel (consultant)	1,2,3
Legal Affairs Consultant	4,5,8
Retirement Assistant Director, Member Services	4,5
Retirement Member Services Manager	4,5
Retirement Business Systems Director	4,5
Retirement Services Manager	4,5
Retirement Internal Audit Manager	4,5
Retirement Information Technology Services Manager	4,5
Retirement Analyst, Administrative Services, Non-Personnel	4,5

Consultants are included in the list of designated employees and are required to disclose pursuant to the broadest disclosure category in the code, subject to the following limitation:

The Retirement Chief Executive Officer may determine, in writing, that a particular consultant, although a "designated position," is hired to perform a range of duties that is limited in scope, and thus is not required to fully comply with the disclosure requirements described in this section. Such written determination shall include a description of the consultant's duties and, based upon that description, a statement of the extent of disclosure requirements. The Retirement Chief Executive Officer's determination is a public record and shall be retained for public inspection in the same manner and location as this conflict of interest code.

Note Regarding Officials Who Manage Public Investments

It has been determined that the positions listed below manage public investments and will file a statement of economic interest pursuant to Government Code Section 87200:

Members of Board of Retirement
Retirement Chief Executive Officer
Retirement Assistant Chief Investment Officer, Director Private Markets
Retirement Investment Officer
Chief Investment Officer (consultant)

APPENDIX B

San Diego County Employees Retirement Association Designated Employees Disclosure Categories

Category 1: All-Inclusive Reportable Investments

Category 2: All-Inclusive Reportable Interests in Real Property

Category 3: All-Inclusive Reportable Income

Category 4: Less-Inclusive Reportable Investments

Investments and business positions in any business entity which contracts, with the San Diego County Employees Retirement Association (SDCERA), to provide services, supplies, materials or equipment of the type utilized by SDCERA, and associated with the position of the designated employee.

Category 5: Less-Inclusive Reportable Income

Income from a source which contracts, with SDCERA, to provide services, supplies, materials or equipment of the type utilized by SDCERA and associated with the position of the designated employee.

Category 6: Less-Inclusive Reportable Interests in Real Property

Interests in real property located in the unincorporated area of the County, or not more than two miles outside the boundaries of the unincorporated area, or within two miles of any land owned by the County.

Category 7: Less-Inclusive Reportable Investments, Unincorporated Area

Investments in any business entity with interests in real property located in the County of San Diego, or not more than two miles outside the boundaries of the County.

Category 8: Less-Inclusive Reportable Income, Unincorporated Area

Income from a source which resides in the County of San Diego, or not more than two miles outside the boundaries of the County.

APPENDIX A

San Diego County Employees Retirement Association Designated Positions and Disclosure Categories

It has been determined that the positions listed below will file a statement of economic interest pursuant to Government Code Section 81000 et seq.:

<u>Designated Positions</u>	<u>Disclosure Category</u>
Retirement Assistant Administrator, Director Member Services	1,2,3
Retirement Assistant Administrator, Chief Operating Officer	1,2,3
General Counsel (consultant)	1,2,3
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Retirement Assistant Director, Member Services	4,5
Retirement Member Services Manager	4,5
Retirement Business Systems Director	4,5
Retirement Services Manager	4,5
Retirement Performance Auditor Internal Audit Manager	4,5
Retirement Information Technology Services Manager	4,5
Retirement Analyst, Administrative Services, Non-Personnel	4,5

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Note Regarding Officials Who Manage Public Investments

It has been determined that the positions listed below manage public investments and will file a statement of economic interest pursuant to Government Code Section 87200:

Members of Board of Retirement
Retirement Chief Executive Officer
~~Retirement Chief Investment Officer~~
Retirement Assistant Chief Investment Officer, Director Private Markets
Retirement Investment Officer
~~Portfolio Strategist (consultant)~~ Chief Investment Officer (consultant)

APPENDIX B

San Diego County Employees Retirement Association Designated Employees Disclosure Categories

Category 1: All-Inclusive Reportable Investments

Category 2: All-Inclusive Reportable Interests in Real Property

Category 3: All-Inclusive Reportable Income

Category 4: Less-Inclusive Reportable Investments

Investments and business positions in any business entity which contracts, with the San Diego County Employees Retirement Association (SDCERA), to provide services, supplies, materials or equipment of the type utilized by SDCERA, and associated with the position of the designated employee.

Category 5: Less-Inclusive Reportable Income

Income from a source which contracts, with SDCERA, to provide services, supplies, materials or equipment of the type utilized by SDCERA and associated with the position of the designated employee.

Category 6: Less-Inclusive Reportable Interests in Real Property

Interests in real property located in the unincorporated area of the County, or not more than two miles outside the boundaries of the unincorporated area, or within two miles of any land owned by the County.

Category 7: Less-Inclusive Reportable Investments, Unincorporated Area

Investments in any business entity with interests in real property located in the County of San Diego, or not more than two miles outside the boundaries of the County.

Category 8: Less-Inclusive Reportable Income, Unincorporated Area

Income from a source which resides in the County of San Diego, or not more than two miles outside the boundaries of the County.